

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 Alexandria Division

4 UNITED STATES OF AMERICA)

5 v.)

Case No. 1:14-cr-00306-GBL-7

6)
7 NOTICE OF FILING
8)

DOUGLAS DURAN CERRITOS)
9 _____)

10 COMES NOW, Douglas Duran Cerritos, through counsel, Dwight E.
11 Crawley and Joseph R. Conte, as directed by the court at the close of business on
12 Monday, March 28, 2016, to provide the court with a list of the FBI Report of
13 Investigation (302s) which identify defendant Cerritos but which have the name of
14 the interviewee redacted.

15 The Bates Numbers for the redacted documents are:

16 EDVA0000418, 435, 480, 492, 502, 513, 558, 578, 659,
17 663, 667, 671, 672, 674, 676, 677, 681, 685, 691, 694, 705,
18 707, 716, 717, 730, 739, 756, 131, 132, 134, 149, 167, 175,
19 183, 184, 186, 196, 197, 201, 222, 223, 230, 247, 272, 294,
20 389, 459, 480, 483, 769, 771 820, 104, 175, 272, 560.
21

22 These reports are “material to preparing the defense” (F.R.Cr.P.
23 16(a)(1)(E)(I)). *See e.g. United States v. Caro*, 597 F.3d 608, 621 “[E]vidence is
24 material as long as there is a strong indication that it will play an important role in
25

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1 uncovering admissible evidence, aiding witness preparation, corroborating
2 testimony, or assisting impeachment or rebuttal.” (4th Cir. 2010) citing *United*
3 *States v. Ross*, 511 F.3d 757, 763 (*cert. denied* 423 U.S. 836).

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5
6 Respectfully submitted,

7
8
9 /s/ Dwight E. Crawley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the forgoing was served by the court's Case Management/Electronic Case Filing (CM/ECF) system this 29th day of March 2016.

/s/ Joseph R. Conte

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